

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

**POWER INTEGRATIONS' [PROPOSED] SPECIAL VERDICT AND
INTERROGATORIES TO THE JURY**

We, the jury, unanimously find as follows:

INFRINGEMENT OF POWER INTEGRATIONS' '876 PATENT

Infringement of the '876 Patent

1. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '876 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 17:	YES	_____	NO	_____
Claim 19:	YES	_____	NO	_____

2. If you answered "NO" as to any claim(s) in question 1, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 17:	YES	_____	NO	_____
Claim 19:	YES	_____	NO	_____

Willful Infringement of the '876 Patent

3. If you answered "YES" as to any claims for any of questions 1-2, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES	_____	NO	_____
-----	-------	----	-------

INFRINGEMENT OF POWER INTEGRATIONS' '851 PATENT**Infringement of the '851 Patent**

4. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '851 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 4:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 11:	YES	_____	NO	_____
Claim 13:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

5. If you answered "NO" as to any claim(s) in question 4, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 4:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 11:	YES	_____	NO	_____
Claim 13:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

Willful Infringement of the '851 Patent

6. If you answered "YES" as to any claims for any of questions 4-5, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES _____ NO _____

INFRINGEMENT OF POWER INTEGRATIONS' '366 PATENT**Infringement of the '366 Patent**

7. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '366 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 9:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 14:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

8. If you answered "NO" as to any claim(s) in question 7, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 9:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 14:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

Willful Infringement of the '366 Patent

9. If you answered "YES" as to any claims for any of questions 7-8, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES _____ NO _____

INFRINGEMENT OF POWER INTEGRATIONS' '075 PATENT

Infringement of the '075 Patent

10. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '075 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 5:	YES	_____	NO	_____

Willful Infringement of the '075 Patent

11. If you answered "YES" as to any claims for question 10, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES	_____	NO	_____
-----	-------	----	-------

VALIDITY OF POWER INTEGRATIONS' '876 PATENT

Anticipation of the '876 Patent

12. Do you find by clear and convincing evidence that any of the following claims of the '876 Patent are anticipated and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 17:	YES	_____	NO	_____
Claim 19:	YES	_____	NO	_____

Obviousness of the '876 Patent

13. Do you find by clear and convincing evidence that any of the following claims of the '876 Patent are obvious and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.) If you answer "YES" as to any claim, proceed to question 14.

Claim 1:	YES	_____	NO	_____
Claim 17:	YES	_____	NO	_____
Claim 19:	YES	_____	NO	_____

14. If you answered "YES" as to any claims for question 13, indicate below which reference(s) you have relied upon in determining the claim(s) are obvious.

VALIDITY OF POWER INTEGRATIONS' '851 PATENT**Anticipation of the '851 Patent**

15. Do you find by clear and convincing evidence that any of the following claims of the '851 Patent are anticipated and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 4:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 11:	YES	_____	NO	_____
Claim 13:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

Obviousness of the '851 Patent

16. Do you find by clear and convincing evidence that any of the following claims of the '851 Patent are obvious and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.) If you answer "YES" as to any claim, proceed to question 17 for that claim.

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 4:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 11:	YES	_____	NO	_____
Claim 13:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

17. If you answered "YES" as to any claims for question 16, indicate below which reference(s) you have relied upon in determining the claim(s) are obvious.

VALIDITY OF POWER INTEGRATIONS' '366 PATENT**Anticipation of the '366 Patent**

18. Do you find by clear and convincing evidence that any of the following claims of the '366 Patent are anticipated and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 9:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 14:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

Obviousness of the '366 Patent

19. Do you find by clear and convincing evidence that any of the following claims of the '366 Patent are obvious and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.) If you answer "YES" as to any claim, proceed to question 20 for that claim.

Claim 1:	YES	_____	NO	_____
Claim 2:	YES	_____	NO	_____
Claim 9:	YES	_____	NO	_____
Claim 10:	YES	_____	NO	_____
Claim 14:	YES	_____	NO	_____
Claim 16:	YES	_____	NO	_____

20. If you answered "YES" as to any claims for question 19, indicate below which reference(s) you have relied upon in determining the claim(s) are obvious.

VALIDITY OF POWER INTEGRATIONS' '075 PATENT

Anticipation of the '075 Patent

21. Do you find by clear and convincing evidence that any of the following claims of the '075 Patent are anticipated and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.)

Claim 1:	YES	_____	NO	_____
Claim 5:	YES	_____	NO	_____

Obviousness of the '075 Patent

22. Do you find by clear and convincing evidence that any of the following claims of the '075 Patent are obvious and therefore invalid? (A "NO" answer to this question is a finding for Power Integrations. A "YES" answer is a finding for Fairchild.) If you answer "YES" as to any claim, proceed to question 23 for that claim.

Claim 1:	YES	_____	NO	_____
Claim 5:	YES	_____	NO	_____

23. If you answered "YES" as to any claims for question 22, indicate below which reference(s) you have relied upon in determining the claim(s) are obvious.

DAMAGES DUE TO POWER INTEGRATIONS

Damages for Infringement of the '876, '851, '366, and/or '075 Patents

24. If you have found that Fairchild has infringed at least one asserted claim from any of the '876, '851, '366, and/or '075 Patents, and you have found that the claim is not invalid and the patent is not unenforceable, do you find by a preponderance of the evidence that Power Integrations suffered actual damages as a result of Fairchild's infringement? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES _____ NO _____

25. If you answered "YES" to question 24, state the type and amount of damages you find Power Integrations to have proven by a preponderance of the evidence:

Past Lost Profits from Lost Sales or Past Reasonable Royalty: _____

Past Lost Profits from Price Erosion: _____

Future Lost Profits from Price Erosion: _____

TOTAL DAMAGES _____

You must each sign this Verdict Form: Dated: _____

_____ (foreperson) _____
